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Attorneys for Plaintiff DRMG, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re

SUPERIOR ACQUISITIONS, INC.,
Debtor.

DRMG, LLC, a California limited liability
company,

Plaintiff,

v.

LINDA S. GREEN, solely in her capacity as
Chapter 11 Trustee for Superior Acquisitions,
Inc.; and SUPERIOR ACQUISITIONS,
INC.,

Defendants.

Adv. Proc. No. 11-1034

Main Case No. 10-13730

Chapter 11

**DRMG, LLC'S MOTION TO DISMISS ALL
OF CHAPTER 7 TRUSTEE'S
COUNTERCLAIMS PURSUANT TO FED.
R. CIV. PROC 12(B)(6), OR IN THE
ALTERNATIVE, FOR A MORE DEFINITE
STATEMENT PURSUANT TO FED. R.
CIV. PROC. 12(E)**

Date: May 6, 2011
Time: 10:00 a.m.
Santa Rosa Courtroom

1 LINDA S. GREEN, Chapter 11 Trustee of
2 the Estate of Superior Acquisitions, Inc.,

3 Counter-claimant,

4 v.

5 DRMG, LLC, a California limited liability
6 company,

7 Counter-defendant.
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10 Plaintiff DRMG, LLC hereby moves the Court, pursuant to the provisions of Bankruptcy
11 Rule 7012 and F.R.Civ.P. 12(b)(6), for an order dismissing each and every counterclaim set forth
12 in the "Counterclaim To Determine Validity, Priority, And Extent And Liens; For Damages For
13 Civil Contempt; To Avoid Post Petition Transfers; And For An Accounting" filed by Defendant
14 and Counter-claimant Linda S. Green, Chapter 11 Trustee in Bankruptcy of the Estate of
15 Superior Acquisitions Inc., on the ground that said complaint fails to state facts sufficient to
16 constitute a claim for relief, or in the alternative, requires a more definite statement.

17 DATED: March 24, 2011

LAW OFFICE OF HOWARD N. MADRIS, A P.C.

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19 By: 

20 Howard N. Madris
21 Counsel for DRMG, LLC
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